

# **Exhibit 6**

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**From:** Anthony Jenkins <anthony@aswtlawyers.com>  
**Sent:** Friday, September 29, 2023 3:56 PM  
**To:** Mueller, Nicole C.  
**Cc:** Richard S. Cornfeld; Wylie, Joseph  
**Subject:** RE: Compass Discussion

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Nicole, thank you for your email below. We will not be producing Mr. Baldwin for his deposition on October 4. I anticipate filing a request to dismiss his case next week. If Defendant insists on proceeding with Mr. Baldwin's deposition, please let me know, in which case I will have to file for a protective order. Thank you.

BR,  
Anthony  
714.675.1258

ANTHONY JENKINS | [ARIAS SANGUINETTI](#) | (310) 844-9696

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**From:** Mueller, Nicole C. <Nicole.Mueller@klgates.com>  
**Sent:** Thursday, September 28, 2023 2:05 PM  
**To:** Anthony Jenkins <anthony@aswtlawyers.com>  
**Cc:** Richard S. Cornfeld <rick@ghalaw.com>; Wylie, Joseph <joseph.wylie@klgates.com>  
**Subject:** Compass Discussion

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Anthony,

I'm following up on the conversation that we had a little while ago regarding the Compass matters.

1. **Pemberton motion to stay.** You agreed not to oppose the motion, subject to the limitations agreed to in the motion to stay the Whitaker matter. I will use the same language in our motion for Pemberton, and, in addition to serving counsel of record, I'll forward you a copy of the motion after it is filed.
2. **Baldwin's voluntary withdrawal of claims.** You asked me if Compass would agree to the withdrawal of Mr. Baldwin's claims. Compass will only agree to Mr. Baldwin's voluntary withdrawal on the condition that he sit for a deposition. As I said on the call, I will not agree to cancel Tuesday's deposition at this time.
3. **Call to the clerk regarding briefing pending before the court.** We are not going to join this call.
4. **Naming conventions of photographs.** You asked me to supplement our discovery responses to include instructions that plaintiffs can rely upon to match the naming convention of the photographs to the references contained in the Survey Instance reports. We will supplement our discovery responses. You also told me that you are investigating whether the produced photographs match the list of requested photographs. If you determine that the produced photographs do not match the list of requested photographs, please let me know.

Best regards,

Nicole

**K&L GATES**

**Nicole C. Mueller** (she/her/hers)

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